

BORIS FELDMAN, State Bar No. 128838
KEITH E. EGGLETON, State Bar No. 159842
MICHAEL R. PETROCELLI, State Bar No. 269460
ANNE S. AUFHAUSER, State Bar No. 300952
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 565-5100
Email: boris.feldman@wsgr.com
keggleton@wsgr.com
mpetrocelli@wsgr.com
aaufhauser@wsgr.com

Attorneys for Defendants
SanDisk Corporation, Sanjay Mehrotra, and
Judy Bruner

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TRENTON GLORE, Individually and On Behalf)
of All Others Similarly Situated,)
Plaintiff,)
v.)
SANDISK CORP., SANJAY MEHROTRA, and)
JUDY BRUNER,)
Defendants.)

CASE NO.: 3:15-cv-01455-VC

CLASS ACTION

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME TO
RESPOND, TO EXTEND TIME TO
FILE CASE MANAGEMENT
STATEMENT, AND TO CONTINUE
CASE MANAGEMENT
CONFERENCE**

AS MODIFIED

AMENDED ORDER

1 Plaintiff Trenton Glore (“Plaintiff”) and defendants SanDisk Corporation, Sanjay
2 Mehrotra, and Judy Bruener (collectively, “Defendants”) in the above-entitled action hereby
3 stipulate:

4 WHEREAS, on March 30, 2015, Plaintiff filed the above-captioned securities class
5 action lawsuit;

6 WHEREAS, this action is subject to the provisions of the Private Securities Litigation
7 Reform Act of 1995 (“Reform Act”), 15 U.S.C. § 78u-4, which, *inter alia*, requires the Court to
8 appoint a lead plaintiff;

9 WHEREAS, on March 31, 2015, the Court entered an Order setting an initial Case
10 Management Conference (“CMC”) for June 30, 2015, and setting Rule 26(f), CMC, and ADR
11 deadlines for June 9, 2015 and June 23, 2015 (“March 31, 2015 Order”);

12 WHEREAS, Defendants have agreed to waive service of the Complaint;

13 WHEREAS, Defendants’ deadline to respond to the complaint is June 1, 2015;

14 WHEREAS, as of the date of this stipulation, at least one other plaintiff has filed a related
15 action in this District: *Glenn Bowers, Individually and On Behalf of Others Similarly Situated v.*
16 *SanDisk Corporation, Sanjay Mehrotra, and Judy Bruener*, Case No. 3:15-cv-02050 (the
17 “Bowers Action”);

18 WHEREAS, Defendants have not yet been served with the complaint in the Bowers
19 Action;

20 WHEREAS, in light of the multiple complaints on file, the potential for additional
21 complaints, and the nature of Plaintiff’s allegations under the Reform Act, Plaintiff has agreed
22 that Defendants need not respond to the complaint pending the appointment of a lead plaintiff
23 and the consolidation of any related actions, including but not limited to the Bowers Action;

24 WHEREAS, in the event that a case or cases in other jurisdictions proceed on a different
25 schedule, the parties agree to revise the terms of this stipulation to ensure that plaintiff in this and
26 related cases in the Northern District of California are not prejudiced;

1 WHEREAS, this stipulation shall not be taken as a waiver of any defenses that
2 Defendants may have to Plaintiff's Complaint pursuant to Rule 12(b) of the Federal Rules of
3 Civil Procedure or otherwise; and

4 WHEREAS, in light of the current procedural posture, and in particular, the fact that a
5 lead plaintiff has not yet been appointed, the parties respectfully request the CMC and related
6 CMC and ADR deadlines be continued as set forth below.

7 NOW, THEREFORE, Plaintiff and Defendants, by and through their respective attorneys
8 of record, stipulate that, if acceptable to the Court:

9 1. Defendants need not respond to the above-captioned complaint pending the appointment
10 of a lead plaintiff pursuant to 15 U.S.C. § 78u-4(a)(3)(B) and the consolidation of any
11 related actions;

12 2. The CMC is continued pending the appointment of a lead plaintiff and the consolidation
13 of any related actions. Likewise, the deadlines for filing a Joint Case Management
14 Statement or ADR documents pursuant to Civil L.R. 16-8 and ADR L.R. 3-4 are
15 continued accordingly. A case management conference is scheduled for ~~August 18, 2015~~.

September 29, 2015

16 IT IS SO STIPULATED.

17
18 Dated: May 20, 2015

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
BORIS FELDMAN
KEITH E. EGGLETON

21 By: /s/ Keith E. Eggleton
Keith E. Eggleton

22
23 650 Page Mill Road
Palo Alto, CA 94304
24 Telephone: (650) 493-9300
Facsimile: (650) 493-6811
25 boris.feldman@wsgr.com
keggleton@wsgr.com

26 Attorneys for Defendants
27 SanDisk Corporation, Sanjay Mehrotra, and
Judy Bruner
28

1 Dated: May 20, 2015

POMERANTZ LLP
JEREMY LIEBERMAN

2
3 By: /s/ Jeremy Lieberman
Jeremy Lieberman

4 600 Third Avenue
5 New York, NY 10016
6 Telephone: (212) 661-1100
jalieberman@pomlaw.com

7 Attorney for Plaintiff
8 Trenton Glore

9 **ATTESTATION**

10 I, Keith E. Eggleton, am the ECF user whose identification and password are being used to
11 file this STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO RESPOND, TO
12 EXTEND TIME TO FILE CASE MANAGEMENT STATEMENT, AND TO CONTINUE CASE
13 MANAGEMENT CONFERENCE. In compliance with General Order 45, X.B., I hereby attest
14 that plaintiffs' counsel Jeremy Lieberman has concurred in this filing.

15 Dated: May 20, 2015

16 WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
BORIS FELDMAN
17 KEITH E, EGGLETON

18 By: /s/ Keith E. Eggleton
Keith E. Eggleton

19 650 Page Mill Road
20 Palo Alto, CA 94304
21 Telephone: (650) 493-9300
Facsimile: (650) 493-6811
22 boris.feldman@wsgr.com
keggleton@wsgr.com

23 Attorneys for Defendants
24 SanDisk Corporation, Sanjay Mehrotra, and
Judy Bruner

25 **IT IS SO ORDERED.**

26
27 Dated: May 22, 2015

